

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

LISA MENNINGER,

Plaintiff,

v.

PPD DEVELOPMENT, L.P.,

Defendant.

Civil Action No. 1:19-cv-11441-LTS

**PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION IN LIMINE TO EXCLUDE
TESTIMONY CONCERNING AN ALLEGED RELATIONSHIP BETWEEN
PLAINTIFF'S SUPERVISOR AND ANOTHER EMPLOYEE (DOC. NO. 111)**

Plaintiff has no present intention of offering evidence concerning Mr. Hacene's romantic relationship with his subordinate. It is feasible, however, that such evidence may become relevant during the course of the trial. For example, if Defendant were to offer evidence that the paramour said something negative concerning Dr. Menninger, evidence of her romantic relationship with Mr. Mekerri (against whom Dr. Menninger lodged an internal complaint) may be relevant to show bias. Accordingly, any decisions concerning the relevance or potential prejudice should be delayed until the time of trial.

If Plaintiff comes to believe that such evidence may be relevant, she will seek to be heard by the Court outside of the presence of the jury prior to eliciting any evidence concerning the alleged relationship.

CONCLUSION

For the foregoing reasons, Plaintiff respectfully requests that this motion be denied.

Respectfully submitted,

/s/ Patrick J. Hannon

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Date: March 14, 2023

CERTIFICATE OF SERVICE

I, Patrick J. Hannon, certify that on March 14, 2023, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to Defendant by electronically serving its counsel of record.

/s/ Patrick J. Hannon

Patrick J. Hannon